## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

| JORGE ALEJANDRO ROJAS      | :                         |
|----------------------------|---------------------------|
|                            | : Case No.: 1:24-cv-10549 |
| Plaintiff,                 | :                         |
|                            | : Judge Andrea R. Wood    |
| V.                         | :                         |
|                            | :                         |
| INSURANCE SUPERMARKET INC. | :                         |
|                            | :                         |
| Defendant.                 | :                         |

## SECOND DECLARATION OF SIDNEY RUA IN SUPPORT OF DEFENDANT INSURANCE SUPERMARKET INC.'S MOTION TO VACATE ENTRY OF DEFAULT

## I, Sidney Rua, declare as follows:

- 1. I am Vice President of Privacy, Compliance & Legal at Insurance Supermarket Inc.("ISI") I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify to the matters stated herein.
- 2. In my role at ISI, all communications from outside counsel regarding Telephone Consumer Protection Act lawsuits are directed to me.
- 3. I have reviewed ISI's communication with Linn Gillen from Jackson Lewis P.C. Ms. Gillen did not send any communications to me regarding this lawsuit.
- 4. Ms. Gillen did not inform me about the existence of the present lawsuit, service in the present lawsuit, or any communication with Plaintiff herein.
- 5. ISI has no record of any attorney-client relationship with Matthew Pitts. Matthew Pitts has never communicated with ISI about the present lawsuit.

6. I have reviewed ISI's internal records and found that an individual using the name "Jorge Rojas" and the at-issue number ending in 4004 consented to receiving marketing calls and text messages on July 12, 2024.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

| Executed on _ | 6/23/2025 | , at | Newmarket, | Ontario, | _Çanada |
|---------------|-----------|------|------------|----------|---------|
| Signed by     | 2         |      |            |          |         |
|               |           |      |            |          |         |

## **Sidney Rua**

Vice President of Privacy, Compliance & Legal, Insurance Supermarket Inc.